



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

RSFA - 99-6355-86
99-5455-69
00-7408-1
00-7666-3

00 JUL 27 PM 3:25

400 Seventh Street, S.W.
Washington, D.C. 20590

89989

JUL 27 2000

Mr. Kevin C. Bodenhamer, Chairman
ASME B 31.4 Section Committee
P. O. Box 21628
Tulsa, OK 74119-4800

Dear Mr. Bodenhamer:

The American Petroleum Institute has established a working group of technical experts to coordinate with the Office of Pipeline Safety for the development of an American National Standards Institute (ANSI) pipeline integrity program standard. This working group has been working effectively since April 2000. The proposed standard would provide detailed standards for pipeline system integrity programs that will supplement protection to high population density areas and those areas which are unusually sensitive to environmental damage, known collectively as "high consequence areas." Once completed, the ANSI pipeline integrity program standard would be available to hazardous liquid pipeline operators for addressing compliance with the Department's proposed regulations on integrity management in high consequence areas. We will also consider incorporating it into our regulations by reference. The first in a series of proposed regulations pertaining to the establishment and execution of integrity management plans was issued by the Department on April 24, 2000 (65 FR 21695) for hazardous liquid pipeline operators operating 500 or more miles of pipeline. We expect to complete the final rule this fall.

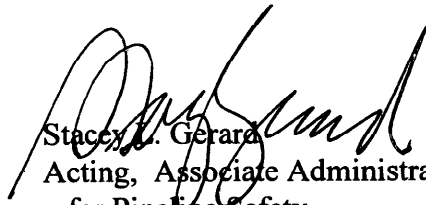
We are seeking a peer review of the ANSI proposed standard for the purpose of assuring us that it will adequately address the regulatory requirements contained in the April 24, 2000 notice. Our office has been in preliminary contact with you, and we're delighted that the Executive Committee of ASME B31.4 will undertake this review. We are particularly pleased that this review will be undertaken by ASME B31.4 since it is nationally recognized as including members with expertise on hazardous liquid pipeline design, construction, testing, maintenance and operation.

2.

The final draft of the ANSI proposed standard is scheduled to be completed the beginning of September 2000, and we will submit it to the Secretary of ASME B31.4 at that time.

This letter confirms your agreement to provide the review. Thank you for your consideration.

Sincerely,



Stacey L. Gerard
Acting, Associate Administrator
for Pipeline Safety